

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

R.W., et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 1:21-cv-02589-SEB-MJD
	)	
UNITED STATES OF AMERICA	)	
	)	
Defendant.	)	

**DEFENDANT'S PRELIMINARY WITNESS LIST**

Pursuant to the Case Management Plan entered on April 13, 2022 (Dkt. 23), defendant the United States of America hereby submits its preliminary list of witnesses who it presently believes it may call at the trial of this case, exclusive of witnesses it may call solely for purposes of impeachment, and exclusive of unknown and unanticipated witnesses it may call solely for purposes of rebuttal. Because discovery is ongoing, this list is tentative and subject to amendment pending further discovery.

1. R.W.
2. Tia Workman.
3. Ryan Workman.
4. C.W.
5. Scott McGauley.
6. Lori Kiemeyer.
7. Gregory Tielking.
8. Officer Aaron Pfaff.

9. Claudia Brinkruff.
10. Steve Wherry.
11. The individuals identified in Plaintiffs' Rule 26 disclosures.
12. To-be-identified medical providers for R.W. from 2019 to the present.
13. To-be-identified providers of psychological and psychiatric care for R.W., C.W., Tia, and Ryan Workman from 2019 to the present.
14. Any individual identified or mentioned in any response to a discovery request served by any party in this action.
15. Any individual identified or mentioned by a deponent in any deposition in this action.
16. Any witness who is required to authenticate documents necessary to impeach another witness or necessary for rebuttal.
17. To-be-identified custodians and authors of records and documents that the parties and non-parties have produced in this action, that the parties have used or will use in the future as exhibits to motions or in depositions or in hearings in this action, that the parties have listed on their exhibits lists, and/or that the parties wish to introduce into evidence at trial.
18. To-be-identified expert witness(es).
19. Other persons listed or called as witnesses by Plaintiffs.

If the United States discovers additional witnesses who it intend to call at the trial of this case, its counsel will furnish the names of the additional witnesses to the Court and to opposing counsel.

Respectfully submitted,

ZACHARY A. MYERS  
United States Attorney

By: /s/ Julian C. Wierenga  
Julian C. Wierenga  
Assistant United States Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that on May 13, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

Edmond W. Foley  
FOLEY & SMALL  
1002 E. Jefferson Blvd.  
South Bend, IN 46617  
[efoley@foleyandsmall.com](mailto:efoley@foleyandsmall.com)

/s/ Julian Wierenga  
Julian C. Wierenga  
Assistant United States Attorney

Office of the United States Attorney  
10 West Market Street, Suite 2100  
Indianapolis, IN 46204  
Telephone: 317-226-6333  
Facsimile: 317-226-5027  
Email: [julian.wierenga@usdoj.gov](mailto:julian.wierenga@usdoj.gov)